

- b. The discovery requested is for use in a foreign proceeding before the English High Court of Justice, Queens Bench Division;
- c. The Applicants are interested persons because they are Claimants in the foreign proceeding;
- d. The parties from whom the discovery is sought are not parties to the proceeding before the English High Court of Justice;
- e. The English High Court of Justice is receptive to U.S. federal-court judicial assistance; and
- f. The requests are not unduly intrusive or burdensome.


(3) The discovery requested is highly relevant to the matter before the English High Court of Justice.

(4) The discovery requested would not be unduly burdensome for the subjects of the subpoenas.

WHEREFORE, the Applicants respectfully request that this Court issue and enter the Proposed Order attached hereto.

Dated: May 24, 2019
New York, New York

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